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Chris Daniel - District Clerk Harris County,
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2014-73687 / Court: 011

CAUSE NO. _____

Henley Menefee

In The District Court of

v.

Harris County, Texas

Universal Music Group
Geffen Records
Capitol Records
Mary Jane Blige (a.k.a. Mary J. Blige)

_____ Judicial District

Plaintiff's Original Petition

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Henley Menefee files this petition against defendants Universal Music Group, Geffen Records, Capitol Records and Mary Jane Blige and would show the Court the following:

I.

Discovery Plan

Plaintiff intends the discovery plan to be conducted under Level 3 of Rule 190.2

II.

Parties

Plaintiff, Henley Menefee, is a resident of Houston, Harris County, Texas.

Defendant, Universal Music Group Inc. address 2220 Colorado Avenue Santa Monica, CA 90404 can be served with citation through its registered agent CT Corporation System at 818 West Seventh St. 2nd Floor Los Angeles, CA 90017.

Defendant Geffen Records is a subsidiary of Universal Music Group Inc. and can be served with process through its parent company Universal Music Group.

Defendant, Capitol Records, is a part of the Capitol Music Group which is wholly owned subsidiary of Universal Music Group, can be served with process at 1750 Vine St. Los Angeles CA 90028.

Defendant Mary Jane Blige is a recording artist with Capitol Record, a division of Universal Music Group. She can be served with process through Capitol Records at 1750 Vine St. Los Angeles CA 90028.

EXHIBIT A

III.

Jurisdiction & Venue

This Court has jurisdiction pursuant to the Texas Government Code.

Per Texas Civil Practice & Remedies Code 15.002, venue for these causes of action lies in Harris County, Texas, because all or a substantial part of the events or omissions giving rise to the claims made the basis of this suit occurred in Harris County, Texas.

IV.

FACTS

1. I have been placed on live television before the United States of America. These criminal code violations of numerous federal statutes have gained financially from products, television shows, intellectual property, marketing, advertising, etc. These federal criminal violations have been utilized for financial gain for government entities, government corporations, major corporations, and other companies and individuals.
2. These violations of the U.S. Criminal Code include 18 USC 371 (Conspiracy) 18 USC 1341 (Fraud), 18 USC 1343 (Wire Fraud), 18 USC 241 (Conspiracy Against Rights), 18 USC 1961 (Racketeering Influenced Corrupt Organization), 18 USC 1959 (Violent Crimes in Aid of Racketeering) 18 USC 119 (Federal Wiretapping Act).
3. These criminal violations have taken place live on television before the citizens of the United States of America. The citizens have viewed me, and these criminal violations live on television and radio. Broadcasters, News Anchors, and Hosts have witnessed these events daily in my life and have discussed them on their shows, sitcoms, and weekly commentaries.
4. They have witnessed the development of new businesses, new companies, new products, new television shows, and even new television networks that have been created by violating federal statutes of fraud, wire fraud, conspiracy, and federal wiretapping.
5. These are products and businesses that have come from me, by violating these federal statutes. These violations have been discussed on television by members of the House of Representatives, members of the United States Senate and the President of the United States of America.
6. The Defendants Universal Music Group, Geffen Records, Capitol Records and Mary Jane Blige have profited from violations of Texas Penal Code 16.02. They have participated and conspired willfully in a criminal conspiracy, violation of Texas Penal Code 15.02. These recordings are included in the album The London Sessions, song "Whole Damn Year". Albums also include No More Drama, Love & Life, The Breakthrough and Growing Pains.

V.

CAUSE OF ACTION
(TX Penal Code 15.02)
Criminal Conspiracy

VI.

CAUSE OF ACTION
(TX Penal Code 16.02)
Unlawful Interception, Use or Disclosure of Wire, Oral or Electronic Communications

VII.
CAUSE OF ACTION
(TRCP Sec. 123.002)

Plaintiff hereby incorporates paragraph 1 thru 6 into this cause of action as if fully restated and set forth herein. Plaintiff seeks damages for violation of Texas Penal Code 16.02 and hereby files this petition against all defendants.

Damages

As a result of the Defendants conduct, Plaintiff has suffered the following damages

- a. Statutory Damages
- b. Actual Damages
- c. Compensatory Damages
- d. Punitive Damages
- e. Unliquidated Damages

Punitive Damages

These violations were willful and intentional. Plaintiff hereby request recovery of punitive damages as provided by Texas Rules of Civil Procedure.

Jury Trial

Plaintiff demands a jury trial on all issues.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff ask that the defendants be cited to appear and answer herein. Plaintiff prays that upon hearing of the cause, judgment be entered for the Plaintiff against all defendants. Plaintiff also requests all such relief both at law and in equity that the plaintiff is entitled.

Respectfully Submitted,

/s/ Henley Menefee

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